

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES COMPANY) CASE NO.
FOR AN ADJUSTMENT OF ITS ELECTRIC RATES) 2014-00371

COMMISSION STAFF'S REQUEST FOR INFORMATION
TO THE KENTUCKY SCHOOL BOARDS ASSOCIATION

The Kentucky School Boards Association ("KSBA"), pursuant to 807 KAR 5:001, is to file with the Commission its electronic responses, a paper original, and three copies of the following information. The information requested herein is due no later than April 6, 2015. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KSBA shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which

KSBA fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a response containing personal information, KSBA shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the response so that personal information cannot be read.

1. Refer to the Testimony of Ronald L. Willhite (“Willhite Testimony”), page 9, lines 8-14.
 - a. Explain whether Mr. Willhite is attempting to link the percentage increase in compensation of Kentucky Utilities Company’s (“KU”) employees with the percentage increase in compensation of Kentucky school teachers.
 - b. Provide an explanation, along with any related spreadsheets or workpapers, of how Mr. Willhite determined that an increase in compensation of 1.0-1.5 percent for KU employees is reasonable.
 - c. Explain whether Mr. Willhite has attempted to quantify the impact of his recommending to limit the increase in employee compensation to 1.0-1.5 percent. If so, provide the results of that quantification. If not, explain why he did not attempt to quantify the impact of his recommendation on KU’s revenue requirement.
2. Refer to the Willhite Testimony, page 9, lines 16-26, and RLW Exhibit 1.

a. Explain whether the Exhibit is intended to contain a Total Company headcount for KU. If so, indicate how that headcount number can be derived from the Exhibit.

b. In the earlier years included in the Exhibit (2011 and 2012), the "TOTAL" variance (on page 2) between budgeted and actual employee headcount averaged 123 employees, or 3.8 percent, while in the two more recent years (2013 and 2014) it averaged 60 employees, or 1.7 percent. Explain whether Mr. Willhite made any inquiry to ascertain the reasons for a decrease of this magnitude in the variance between budgeted and actual headcount.

3. Refer to the Willhite Testimony, page 10, lines 8-10. Provide supporting documentation for the statement that some schools will experience a base rate increase 75 percent greater than other customers on the Primary Service ("PS") rate and the Time-of-Day Secondary ("TODS") rate.

4. Refer to the Willhite Testimony, page 11, lines 13-15, wherein KSBA recommends that two new rate schedules be added, "PS-School" and "TOD-School," and that the demand charges be set at no greater than 75 percent of the PS and TODS demand charges. Explain how the 75 percent proposed limitation was determined.

5. Refer to the Willhite Testimony, pages 11-12. Describe the prevalence of All-electric School Service ("AES") and Sports Field Lighting tariffs in Kentucky and at electric utilities around the country. Provide a list of electric utilities of which KSBA is aware that have current AES and Sports Field Lighting tariffs that continue to be available to new customers.

6. Refer to the Willhite Testimony, page 13, lines 29-32. Explain in detail how the proposed sport fields rider would be structured and include KSBA's proposed rates for the rider.



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DATED **MAR 23 2015**

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